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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

12 TESSERA, INC.,

Case No. 4:05-cv-04063 CW

13 Plaintiff,

**DECLARATION OF SUNDEEP K. (ROB)
ADDY IN SUPPORT OF PLAINTIFF
TESSERA'S OPENING BRIEF
REGARDING CLAIM CONSTRUCTION
AND MOTION FOR SUMMARY
JUDGMENT**

14 vs.

15 ADVANCED MICRO DEVICES, INC., et al.,

Judge: Hon. Claudia Wilken

16 Defendants.

17
18 AND RELATED CASES
19

Related Case: 4:12-cv-00692-CW

1 I, Sundeep K. (Rob) Addy, declare as follows:

2 1. I am a partner at Bartlit Beck Herman Palenchar & Scott LLP, counsel for Tessera,
3 Inc. in the above-captioned actions.

4 2. I submit this declaration in support of Tessera, Inc.'s Opening Brief Regarding
5 Claim Construction and Motion for Summary Judgment, filed concurrently herewith.

6 3. Attached hereto as Exhibit A is a true and correct copy of United States Patent No.
7 5,679,977, dated December 22, 1998.

8 4. Attached hereto as Exhibit B is a true and correct copy of United States Patent No.
9 5,582,326, dated December 22, 1998.

10 5. Attached hereto as Exhibit C is a true and correct copy of the Order Construing
11 Disputed Claims and Terms in *Samsung Electronics Co. v. Tessera Technologies, Inc.*, No. 4:02-
12 cv-5837-CW (Dkt. 128) (N.D. Cal.), dated January 8, 2004.

13 6. Attached hereto as Exhibit D is a true and correct copy of the Order Construing
14 Claims in *Texas Instruments, Inc. v. Tessera, Inc.*, No. C-00-2114-CW (N.D. Cal.), dated May 25,
15 2001.

16 7. Attached hereto as Exhibit E is a true and correct copy of the Initial Determination
17 on Violation of Section 337 and Recommended Determination on Remedy and Bond, filed in
18 International Trade Commission ("ITC") Investigation No. 337-TA-605, dated December 1, 2008.

19 8. Attached hereto as Exhibit F is a true and correct copy of the Initial Determination,
20 filed in ITC Investigation No. 337-TA-432, dated September 25, 2001.

21 9. Attached hereto as Exhibit G is a true and correct copy of the Claim Construction
22 Memorandum Opinion and Order in *Tessera, Inc. v. Micron Tech., Inc.*, Case No. 05-cv-0094,
23 Dkt. No. 295 (E.D. Tex.), dated March 22, 2006.

24 10. Attached hereto as CONFIDENTIAL Exhibit H (and filed with this Court under
25 seal) is a true and correct copy of the TCC® License Agreement between Tessera, Inc. and SGS-
26 Thompson Microelectronics, Inc. (the predecessor entity to Defendant STMicroelectronics Inc.
27 ("ST Inc.")), dated July 28, 1997.

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1 11. Attached hereto as CONFIDENTIAL Exhibit I (and filed with this Court under
2 seal) is a true and correct copy of excerpts from the Rebuttal Expert Report of James E.
3 Malackowski, dated August 30, 2013.

4 12. Attached hereto as CONFIDENTIAL Exhibit J (and filed with this Court under
5 seal) is a true and correct copy of the Witness Statement of Archibald Malone, given in ITC
6 Investigation No. 337-TA-605 on February 7, 2008.

7 13. Attached hereto as CONFIDENTIAL Exhibit K (and filed with this Court under
8 seal) is a true and correct copy of the TCC® License Agreement between Tessera, Inc. and
9 Toshiba Corporation, dated April 1, 1999.

10 14. Attached hereto as Exhibit CONFIDENTIAL Exhibit L (and filed with the Court
11 under seal) is a true and correct copy of the First License Amendment to the TCC® License
12 Agreement between Tessera, Inc. and Toshiba Corporation, dated April 1, 2002.

13 15. Attached hereto as Exhibit M is a true and correct copy of a facsimile transmission
14 from Chris Pickett to Archie Malone, dated September 10, 1997. Personal data identifiers,
15 including bank account and routing information for Tessera, Inc., have been redacted under Fed.
16 R. Civ. P. 5.2.

17 16. Attached hereto as Exhibit N is a true and correct copy of an excerpt from Tessera,
18 Inc.'s First Supplemental Responses to STMicroelectronics Inc.'s Fifth Set of Interrogatories
19 (Nos. 21-30).

20 17. Attached hereto as Exhibit O is a true and correct copy of a facsimile transmission
21 from Bill Carlson to Mike Hundt, dated August 25, 1997.

22 18.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Executed March 18, 2014, in Denver, Colorado.

26

27

/s/ Sundee K. (Rob) Addy

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Sundee K. (Rob) Addy